U.S. DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
National Ocean Service
Office of Ocean Resources Conservation and Assessment
Hazardous Materials Response and Assessment Division
7600 Sand Point Way NE, BIN C15700
Seattle, WA 98115

19 March 1998

Mr. Chuck Clarke
Regional Administrator
U.S. Environmental Protection Agency, Region X
1200 Sixth Avenue
Seattle, WA 98101

Dear Mr. Clarke:

I am writing on behalf of the National Oceanic and Atmospheric Administration (NOAA) to request that the Environmental Protection Agency perform a Preliminary Assessment, as described in the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) Section 105 (d). This assessment should initiate a comprehensive approach to evaluating and remediating contaminated sediments in the lower Duwamish River, King County, Washington.

NOAA acts on behalf of the Secretary of Commerce as a Federal trustee for living and non-living natural resources in coastal and marine areas. Resources of concern to NOAA include all life stages, wherever they occur, of fishery resources of the exclusive economic zone and continental shelf; anadromous species throughout their ranges; endangered and threatened species for which NOAA is responsible, and the ecosystems supporting these living marine and anadromous resources. In the case of the Duwamish River, NOAA is a co-trustee with the Department of Interior, the State of Washington, the Muckleshoot Indian Tribe, and the Suquamish Tribe.

The Duwamish estuary is an important habitat for more than 50 fish species, including chum, chinook, and coho salmon and steelhead trout. The river supports recreational, subsistence, and commercial fishing. Three salmon hatcheries within the Duwamish River system release approximately 10 million juvenile salmon each year. The river, its tributaries, and surrounding habitat support an equally large natural salmon run, as well as more than 80 species of birds and 9 species of mammals.

As you are no doubt aware, NOAA's National Marine Fisheries Service (NMFS) recently announced a proposal to list Puget Sound chinook salmon populations, including those utilizing the Duwamish River, under the Endangered Species Act. Investigations carried out over several years by the NMFS Northwest Fisheries Science Center have demonstrated that exposure

of outmigrating juvenile salmon to contaminated Duwamish River sediments is associated with a range of deleterious effects, including reduced growth, reduced immune system function, and increased mortality following exposure to pathogens. The Duwamish River is among areas proposed by NMFS for designation as critical habitat for chinook salmon.

The recent Resource Conservation and Recovery Act (RCRA) investigations at the Boeing Plant 2 facility have documented significant PCB releases to the Duwamish River and sediments. Sampling by the King County Department of Natural Resources also demonstrates that PCBs and other contaminants have accumulated in Duwamish River sediments. NOAA is concerned that current RCRA investigations at the Boeing Plant 2 facility are limited in geographic scope and that significant contamination extends beyond the area currently under consideration for remediation within the corrective measures study. Preliminary results of a survey of PCBs in Duwamish sediments conducted by NOAA indicate contamination in areas downstream and across the river channel from the limited area under consideration by the RCRA program.

NOAA specifically requests that EPA perform a comprehensive sampling program under Superfund, coordinate with NOAA as provided for in CERCLA Section 104 (b)(2) to determine the nature and extent of contamination within the Duwamish River, and take the remedial actions necessary to protect this important marine habitat.

Sincerely,

David Kennedy, Chief
Hazardous Materials Response
and Restoration Division

cc: W. Connor (NOAA/DAC)
A. Fritz (NOAA/CRC)
C. O'Connor (NOAA/GC)